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12 MHM SOLUTIONS, LLC

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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 NAVDEEP DHALIWAL, an individual,
18 Plaintiff,

19 v.
20 MHM SOLUTIONS, LLC, a Foreign Limited
21 Liability Company; STATE OF NEVADA
22 BUREAU OF DISABILITY ADJUDICATION,
23 a Department of the State of Nevada,

24 Defendants.

25 Case No. 2:21-cv-00568-GMN-BNW

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28 **STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO FILE
RESPONSIVE PLEADING
(FIRST REQUEST)**

29 Plaintiff NAVDEEP DHALIWAL (“Plaintiff”) and Defendant MHM SOLUTIONS, LLC
30 (“Defendant”) by and through their counsel, hereby stipulate and agree to extend the time for
31 Defendant MHM Solutions, LLC to file a response to the Complaint by two (2) weeks from June 15,
32 2021, up to and including **June 29, 2021**. This is the first request for an extension of time to respond
33 to the Complaint. The parties make this request as Defendant is continuing to gather information and
34 requires additional time to prepare a response.

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1 The instant request is made in good faith and not for the purpose of delay.

2 || Dated: June 9, 2021

Dated: June 9, 2021

3 || Respectfully submitted,

Respectfully submitted,

5 || /s/ Trevor J. Hatfield

TREVOR J. HATFIELD, ESQ.
HATFIELD & ASSOCIATES, LTD.

Attorney for Plaintiff
NAVDEEP DHALIWAL

/s/ Amy L. Thompson

WENDY M. KRINCEK, ESQ.
AMY L. THOMPSON, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendant
MHM SOLUTIONS, LLC

ORDER

IT IS SO ORDERED.

Dated: June 11, 2021.

UNITED STATES MAGISTRATE JUDGE

4828-3321-4958.1 / 108840-1045